

Comment Submission 17

Department of Ecology Eastern Regional Office's Draft EIS Comments for the Wallula Power Plant

Submitted by Douglas I. Jayne
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Spokane, WA
April 11, 2002

Note: No comments were submitted to me on the Draft EIS by staff at office by the deadline set for submitting comments. I have just a few minor points of clarification listed below that I am forwarding.

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| 1. Page 2-46 – The Department of Ecology does not handle wastewater discharge permits for onsite sewer systems that are less than 14,500 gallons. The regional health districts handle permits for systems up to 3,500 gallons and state dept. of health handles systems between 3,500 -14,500 gallon capacities. | 17-1 |
| 2. Page 2-46 – A water right may be needed for reuse of stormwater under certain circumstances. Contact George Schlender (Water Resources Program) at Ecology's Eastern Regional Office for clarification on whether a water right is needed (509) 456-5057. I am not aware of any specific "permit" that can be obtained by Ecology for reuse of stormwater. | 17-2 |
| 3. The status for water rights procurement should be updated in the Final EIS. | 17-3 |
| 4. Page 3.3-31 – Will there be any resulting impacts to the trees on fiber farm by the allocation of water to the power plant? | 17-4 |
| 5. The status of the PSD air permit should be updated in the Final EIS. | 17-5 |
| 6. Page 3.2-12 – The acceptance by EPA of emission offset credits for PM 10 should be updated in the Final EIS. | 17-6 |
| 7. Page 1-6 Summary – It would be useful if mention is made on this page that the alternatives listed here are discussed in detail in Section 2.3 (beginning on page 2-34) | 17-7 |
| 8. Appendix A (Table) Page A-7 – The response to a detected leak through the liner system and/or through the upper liner is <u>not</u> discussed and should be. | 17-8 |
| 9. Page A-21 (Waste Disposal) Sludge resulting from the evaporation of wastewater effluent needs to be tested to determine if it designates as Dangerous Waste (DW) before disposing of it. (The likelihood of this material designating as DW is small, but testing of a few representative samples of the salt cake before it is hauled off will help insure the material is going to the proper facility. Copies of the test results should be maintained on site. They will provide evidence that the company is acting responsibly.) | 17-9 |

**Responses to Comment Submission 17,
Letter from Douglas I. Jayne,
Washington Department of Ecology Eastern Regional Office**

- 17-1. The Draft EIS table showing permit, approval, and consultation requirements for the project has been revised to reflect your comment. Please see Chapter 1, Table 1-2 of this Final EIS for an updated listing of permit requirements.
- 17-2. The applicant will not collect stormwater for reuse and therefore a water rights permit is not required for stormwater. Please see Chapter 1, Table 1-2 of this Final EIS for an updated listing of permit requirements and Chapter 3, Section 3.3 for an updated discussion of public and private water supplies.
- 17-3. The status for water rights procurement has been updated in the Final EIS (see Chapter 3, Section 3.3). The Reports of Examination for the water right transfers are included as Appendix C of this Final EIS. Please see also response to comment 19-26.
- 17-4. The trees at the Boise Cascade fiber farm are grown for paper production. Since the water that is currently used to grow these trees will no longer be available, the trees will likely either die or be harvested.
- 17-5. Section 3.2 has been updated to reflect the status of the PSD review by EFSEC and EPA. Please see Chapter 3 of this Final EIS for updated text.
- 17-6. Section 3.2 has been updated to describe the status of the emission offset review process. Please see Chapter 3 of this Final EIS for updated text.
- 17-7. Thank you for your comment.
- 17-8. Appendix A has been updated to discuss the response in the event of a leak through the liner. It should be noted, however, that the liner system would contain several protective layers to prevent leakage to the ground. Also, the volume of water in the evaporation ponds at any given time would be minimal, the contents would not constitute a hazardous or dangerous waste, and that the primary “contaminant” would be salinity. Because of these factors, the impact from the unlikely occurrence of a leak that reaches the ground would be minor and short-lived.
- 17-9. A review of the wastewater discharge to the proposed impoundments has been completed by EFSEC’s independent consultant and the Department of Ecology to address this matter. The report submitted to EFSEC included recommended Site Certification Agreement conditions addressing the confirmation of the designation of the impounded solids. Please see response to comment 21-3 for further discussion.